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September 2, 2016

United States Environmental Protection Agency
Attn: Harbor Comments
805 SW Broadway, Suite 500
Portland, OR 97205

Issued via email: harborcomments@epa.gov

With this submittal, the City of St. Helens is providing the United States Environmental Protection Agency with information we believe to be relevant and important in your decision-making process for the Portland Harbor Superfund Site Record of Decision.

City of St. Helens Central Waterfront

In response to community interests, the City of St. Helens is creating a long-term waterfront redevelopment plan. Filling in its centrally-located wastewater treatment lagoon would add 39 acres of land for public amenities, water access and other development opportunities. Using the site as a commercially-viable sediment and soil disposal facility could generate revenue to cover redevelopment costs and potentially support other City services. Only non-hazardous materials - sediment, sludge from its wastewater treatment plant, and soil - would be used to fill the lagoon.

A market analysis report released by the City provides insight into how we might repurpose the wastewater treatment lagoon. The report demonstrates that there is strong demand for a non-hazardous (Subtitle D) sediment-disposal facility in the region. The market analysis also demonstrates that repurposing the lagoon for sediment disposal and confinement is a more sustainable, lower cost option for the Portland Harbor Superfund Site.

The analysis reveals significant demand for sediment disposal in the Portland metro area. Estimates suggest there is a regional need for 4.5 million cubic yards of disposal space over a 20-year period. The facility could accommodate between 2.2 and 4.0 million cubic yards of material. Facility development and operations could be phased to align with demand over time.

While there are several sites in the area that can also accept material from upland facilities, the facility's location would allow it to directly offload sediment from barges, eliminating transload costs and significantly reducing transportation costs. It could also accommodate deliveries by rail or truck, and it would be the only RCRA Subtitle D facility with barge-transfer infrastructure immediately adjacent to operations. The St. Helens facility is also located much closer to the Portland Harbor Superfund Site, which significantly reduces environmental impacts.

The City is in the process of gathering public input about the best reuse of the site. As plans are further developed, the City will begin discussions with the Oregon Department of Environmental Quality about the solid waste facility permitting process, which is expected to take two to four years.

The facility would be permitted as a Subtitle D solid waste landfill. It would have a bottom liner and leachate collection system, as well as a top liner, stormwater controls and other features required of solid waste facilities. It would be permitted similarly to all other solid waste disposal options available in the region for acceptance of Portland Harbor sediment, including permit conditions defining acceptable wastes. Conformance with the EPA's Final Off-Site Rule would apply here as it would be for all other candidate disposal sites, thus ensuring consistency with the National Contingency Plan.

Due to its location proximal to the Portland Harbor and upland from the river, the revitalization benefits to the community, and the reduced cost of disposal, this facility represents a significant sustainability uplift relative to currently available options.

Benefits to the City

- Waterfront redevelopment aspirations can be achieved.
- Community revitalization and access to waterfront.
- Revenue for redevelopment and other purposes can be generated.

Benefits to the Region

- Significantly lower transportation costs for maintenance dredging and Lower Willamette River Navigation Channel maintenance.
- Significantly lower greenhouse gas emissions associated with ground-based sediment transportation.
- Increased safety through avoidance of large-scale truck transport.

Benefits to the Portland Harbor Superfund Site

- Same as regional benefits.
- Significantly reduced cost or possible avoidance of transload facility (construction, operation, maintenance, and closure), as the transload system, if needed, would serve only the relatively small portion of sediment destined for a Subtitle C landfill.
- Enhanced environmental protection, enhanced public benefit, and increased community acceptance relative to an in-water confined disposal facility.

Summary

Although the permitting of this facility will be independent of the CERCLA process, we offer this information to you for use in your Portland Harbor Superfund Site decision-making. Specifically, we see the sustainability benefits this facility could provide, including reduced costs, increased safety, community revitalization, and reduced greenhouse gas emissions, to be highly relevant and timely.

Respectfully.

Randy Peterson, Mayor

John Walsh, City Administrator